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Attorneys for Plaintiff DIRUL ROBINSON

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

DIRUL ROBINSON, an individual;

Plaintiff,

V.

CITY OF TORRANCE; TORRANCE POLICE DEPARTMENT; TORRANCE POLICE DEPARTMENT OFFICER SATTERFIELD; TORRANCE POLICE DEPARTMENT OFFICER YOUNG; TORRANCE POLICE DEPARTMENT OFFICER WALLACE; TORRANCE POLICE DEPARTMENT OFFICER TOMISIC; DOE POLICE OFFICERS 1-20, inclusive; and DOE CORRECTIONAL OFFICERS 1-20, inclusive;

Defendants.

Case No.: 2:22-cv-05173-RGK-E

Assigned to the Hon. R. Gary Klausner

PLAINTIFF'S PROPOSED SPECIAL VERDICT FORM

Pre-Trial Conference: June 5, 2023

Trial Date: June 13, 2023

We, the jury, unanimously find the following verdict on the questions submitted to us based on the preponderance of the evidence:

SECTION 1: DEFENDANT CHRISTOPHER ALLEN-YOUNG

Claim 1: Excessive Force

1. Did Defendant Christopher Allen-Young intentionally detain Plaintiff Dirul Robinson?

Yes No

If your answer to question 1 is yes, then answer question 2. If you answered no, stop here and answer question 6 below, under Claim 2 “Unlawful Seizure and Detention.”

2. Was Defendant Christopher Allen-Young acting or purporting to act in the performance of his official duties as a police officer when he detained Plaintiff Dirul Robinson?

Yes No

If your answer to question 2 is yes, then answer question 3. If you answered no, stop here and answer question 6 below, under Claim 2 “Unlawful Seizure and Detention.”

1 3. Did Defendant Christopher Allen-Young use excessive force in detaining
2 Plaintiff Dirul Robinson?

3 Yes No
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5 *If your answer to question 3 is yes, then answer question 4. If you answered no,*
6 *stop here and answer question 6 below, under Claim 2 "Unlawful Seizure and*
7 *Detention."*

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10 4. Did Defendant Christopher Allen-Young's use of excessive force against
11 Plaintiff Dirul Robinson cause harm to Mr. Robinson?

12 Yes No
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14 *If your answer to question 4 is yes, then answer question 5. If you answered no,*
15 *stop here and answer question 6 below, under Claim 2 "Unlawful Seizure and*
16 *Detention."*

17

18 5. Do you find that Defendant Christopher Allen-Young's excessive force
19 against Plaintiff Dirul Robinson was malicious, oppressive, or in reckless disregard of
20 Mr. Robinson's rights?

21 Yes No
22

23 *After answering either "yes" or "no" to question 5, please answer question 6*
24 *below, under Claim 2 "Unlawful Seizure and Detention."*

Claim 2: Unlawful Seizure and Detention

6. Was Plaintiff Dirul Robinson intentionally seized and detained by officers acting under color of law?

Yes No

If your answer to question 6 is yes, then answer question 7. If you answered no, stop here and answer question 12 below, under Section 2 “DEFENDANT JOSHUA SATTERFIELD.”

7. Was Defendant Christopher Allen-Young an integral participant in the seizure and detention of Plaintiff Dirul Robinson?

Yes No

If your answer to question 7 is yes, then answer question 8. If you answered no, stop here and answer question 12 below, under Section 2 “DEFENDANT JOSHUA SATTERFIELD.”

8. Did Defendant Christopher Allen-Young know, or reasonably should have known, that his participation in the seizure and detention of Plaintiff Dirul Robinson would cause a deprivation of Mr. Robinson's rights?

Yes No

If your answer to question 8 is yes, then answer question 9. If you answered no, stop here and answer question 12 below, under Section 2 “DEFENDANT JOSHUA SATTERFIELD.”

9. Was the seizure and detention of Plaintiff Dirul Robinson unreasonable?

Yes No

If your answer to question 9 is yes, then answer question 10. If you answered no, stop here and answer question 12 below, under Section 2 “DEFENDANT JOSHUA SATTERFIELD.”

10. Did Defendant Christopher Allen-Young's participation in the seizure and detention of Plaintiff Dirul Robinson cause harm to Mr. Robinson?

Yes No

If your answer to question 10 is yes, then answer question 11. If you answered no, stop here and answer question 12 below, under Section 2 “DEFENDANT JOSHUA SATTERFIELD.”

11. Do you find that Defendant Christopher Allen-Young's participation in the seizure and detention of Plaintiff Dirul Robinson was malicious, oppressive, or in reckless disregard of Mr. Robinson's rights?

Yes No

After answering either “yes” or “no” to question 11, please answer question 12 below, under Section 2 “DEFENDANT JOSHUA SATTERFIELD.”

SECTION 2: DEFENDANT JOSHUA SATTERFIELD

Claim 1: Excessive Force

12. Did Defendant Joshua Satterfield intentionally detain Plaintiff Dirul Robinson?

Yes No

If your answer to question 12 is yes, then answer question 13. If you answered no, stop here and answer question 17 below, under Claim 2 “Unlawful Seizure and Detention.”

13. Was Defendant Joshua Satterfield acting or purporting to act in the performance of his official duties as a police officer when he detained Plaintiff Dirul Robinson?

Yes No

If your answer to question 13 is yes, then answer question 14. If you answered no, stop here and answer question 17 below, under Claim 2 “Unlawful Seizure and Detention.”

14. Did Defendant Joshua Satterfield use excessive force in detaining Plaintiff Dirul Robinson?

Yes No

If your answer to question 14 is yes, then answer question 15. If you answered no, stop here and answer question 17 below, under Claim 2 “Unlawful Seizure and Detention.”

15. Did Defendant Joshua Satterfield's use of excessive force against Plaintiff Dirul Robinson cause harm to Mr. Robinson?

Yes No

If your answer to question 15 is yes, then answer question 16. If you answered no, stop here and answer question 17 below, under Claim 2 “Unlawful Seizure and Detention.”

16. Do you find that Defendant Joshua Satterfield's excessive force against Plaintiff Dirul Robinson was malicious, oppressive, or in reckless disregard of Mr. Robinson's rights?

Yes No

After answering either “yes” or “no” to question 16, please answer question 17 below, under *Claim 2 “Unlawful Seizure and Detention.”*

Claim 2: Unlawful Seizure and Detention

17. Was Plaintiff Dirul Robinson intentionally seized and detained by officers acting under color of law?

Yes No

If your answer to question 17 is yes, then answer question 18. If you answered no, stop here and answer question 23 below, under Section 3 “DAMAGES.”

18. Was Defendant Joshua Satterfield an integral participant in the seizure and detention of Plaintiff Dirul Robinson?

Yes No

If your answer to question 18 is yes, then answer question 19. If you answered no, stop here and answer question 23 below, under Section 3 “DAMAGES.”

19. Did Defendant Joshua Satterfield know, or reasonably should have known, that his participation in the seizure and detention of Plaintiff Dirul Robinson would cause a deprivation of Mr. Robinson's rights?

Yes No

If your answer to question 19 is yes, then answer question 20. If you answered no, stop here and answer question 23 below, under Section 3 “DAMAGES.”

20. Was the seizure and detention of Plaintiff Dirul Robinson unreasonable?

Yes No

If your answer to question 20 is yes, then answer question 21. If you answered no, stop here and answer question 23 below, under Section 3 “DAMAGES.”

21. Did Defendant Joshua Satterfield's participation in the seizure and detention of Plaintiff Dirul Robinson cause harm to Mr. Robinson?

Yes No

If your answer to question 21 is yes, then answer question 22. If you answered no, stop here and answer question 23 below, under Section 3 “DAMAGES.”

22. Do you find that Defendant Joshua Satterfield's participation in the seizure and detention of Plaintiff Dirul Robinson was malicious, oppressive, or in reckless disregard of Mr. Robinson's rights?

Yes No

After answering either “yes” or “no” to question 22, please answer question 23 below, under Section 3 “DAMAGES.”

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1 **SECTION 3: DAMAGES**

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3 **Defendant Christopher Allen-Young**

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5 23. As a result of Defendant Christopher Allen-Young's conduct, what is the
6 amount of damages to which Plaintiff Dirul Robinson is entitled for each of the
7 following categories?

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9 • Past economic loss, including lost earnings: \$ _____

10 • Future economic loss, including lost earnings: \$ _____

11 • Past non-economic loss, including emotional distress: \$ _____

12 • Future non-economic loss, including emotional distress: \$ _____

13 • Punitive damages: \$ _____

14 TOTAL: \$ _____

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17 *Please answer question 24 on the next page.*

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Defendant Joshua Satterfield

24. As a result of Defendant Joshua Satterfield's conduct, what is the amount of damages to which Plaintiff Dirul Robinson is entitled for each of the following categories?

- Past economic loss, including lost earnings: \$ _____
- Future economic loss, including lost earnings: \$ _____
- Past non-economic loss, including emotional distress: \$ _____
- Future non-economic loss, including emotional distress: \$ _____
- Punitive damages: \$ _____

TOTAL: \$ _____

STOP. There are no more questions to answer. Please instruct the foreperson to sign and date this verdict form below.

Dated:

JURY FOREPERSON